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**REMARKS**

Applicants appreciate Examiner's consideration of this draft Amendment and Response and the granting of an interview with Applicants' representative. Applicants have attempted to incorporate the Examiner's suggestions into the claim amendments and the response.

**Status of the Claims:**

Claims 1, 6, 11, 13-15, 18-20, 21, and 23-26 are hereby amended

The pending claims in the application are now claims 1, 3-6, 8-11, 13-16, 18 21, and 23-26, with claims 1, 11, and 21 being in independent form.

Claim 1 was amended to more particularly describe that the combination of the minimal contrast and the microscale can substantially hide the second printed matter from the naked eye while preventing the second printed matter from being resolved unless the second printed matter is viewed using a magnification lens. Claim 1 was amended to more particularly describe that the second printed matter communicates the same identifying information as the first printed matter. Finally, claim 1 was slightly reworded to improve readability by moving the information in the final two "wherein" clauses to appropriate locations within the rest of the claim

Claim 11 was amended to more particularly describe that the combination of the second microscale and the means for hiding render the second printed matter not ascertainable to the naked eye unless said second printed matter is viewed using a magnification lens. Claim 11 also was amended to more particularly explain that the second printed matter conveys the same information as the first information and that the first printed matter of each card comprises first information specific to at least one of the plurality of identification documents, the identification document itself, and the particular person identified in each card. Finally, claim 11 was slightly reworded to improve readability by moving the information in the final two "wherein" clauses to appropriate locations within the rest of the claim.

Claim 21 was amended to more particularly describe that the combination of the minimal contrast and the microscale can substantially hide the second printed matter from the naked eye while preventing the second printed matter from being resolved unless the second printed matter is viewed using a magnifying lens. Claim 21 was amended to more particularly describe that the

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second information comprises information capable of communicating the same identifying information as said first information. Claim 21 also was slightly reworded to improve readability by moving the information in the final "wherein" clause and information describing the second printed matter to appropriate locations within the rest of the claim.

Claim 21 also was reworded to remove the step of "representing said information on said base card at a second micro scale" and include it as part of the printing step through the phrase "said second information comprising information capable of communicating the same identifying information as said first information".

Claim 21 and its dependent claims 23-26 were amended to more clearly describe the invention by correcting inconsistent usage within the claims between the terms "information" and "printed matter"

Applicants submit that no new matter has been added, and all claim amendments are supported throughout the Specification as filed, and at least at page 4, line 16 to page 5, line 2, page 7, lines 10-28, and page 9, lines 11-20. Applicants believe that the claims in their present form are patentably distinguishable over the art of record and in a condition for allowance.

### The 103 Rejections

Claims 1, 3-6, 8-11, 13-16, 18-21, 23-26 are now pending in the application and all are finally rejected in the above-identified Office Action. The Office Action Summary page of the Office Action listed also listed claim 2 as being rejected, but Applicants presume that such listing was an inadvertent error, because claim 2 was cancelled during Applicants response dated November 30, 1999, to a prior Office Action that issued on September 28, 1999.

Claims 1, 11, and 21 are the independent claims in this application. All rejections now standing in the application are under 35 USC 103(a) as being unpatentable over UK Patent GB-2159461A ("the '461 patent" in view of US 1428278 to Dow ("the Dow patent").

The Examiner contends in the rejection that the '461 patent teaches all elements of claim 1 except the feature of minimal contrast hiding printed matter from the naked eye wherein the printed matter and a background color are printed in various hues. However, it is respectfully contended that the '461 patent does not teach or suggest, and in fact teaches away, from at least one other feature in claim 1 as amended, which feature also is not present in the Dow patent

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Specifically, the Examiner has stated that the microprint information (3) of the '461 patent is analogous to the second printed matter of claim 1 in several respects, particularly in that the microprint information (3) is smaller than the first scale rendering of the information, is spaced from the first scale rendering of the information, and conveys identifying information specific to the identifying person. However, the microprint information (3) differs from the second printed matter of claim 1 in at least one important respect:

The '461 patent expressly states that its microprint information (3) "cannot be ascertained or readily ascertained by the naked eye (even with the aid of a magnifying lens)" (see col. 2, lines 127-130). The microprint (3) of the '461 has this quality because the card of the '461 patent is specifically constructed and arranged to hide this information unless a special viewer (not a magnifying lens) is used (, see FIG. 1 of the '461 patent as well as col. 1, lines 45-77 and col. 1, line 127 to col. 2, line 10). The information preferably is hidden in a transparent "window" through which light (from the projector or reader) is transmitted, to show the information in enlarged form on a screen. The manner of viewing the microprint (3) is very different from the manner of viewing the second printed matter of claim 1.

In stark contrast, in the present invention, the second printed matter of claim 1 as amended is specifically described as being able to be resolved using a magnification lens. This provides the advantage (as stated in the Specification at page 1, lines 1-5) of being able to determine the authenticity of an identification document produced in accordance with the invention in a cost efficient manner (through use of low cost equipment such as a magnification lens). Both this feature and its use are entirely different from that described for the microprint (3) of the '461 patent. The microprint (3) of the '461 patent is read by inserting the portion of the card containing the microprint (2) into a special reader or projector then reading the information in greatly enlarged form on a screen (see col. 2, lines 4-23).

Additionally, the '461 patent neither teaches or suggests that its microprint information (3) is there to communicate the same identifying information as information printed elsewhere in the card. In the '461 patent, the microprint information (3) is described as providing details on the authorized holder, such as a photograph, medical data, account number, etc. (see col. 1, lines 107-119). This information is not described as being printed in visible (to the naked eye) form anywhere else on the card, which is understandable because much of the microprint information

enhancing can be described as printed matter

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*Does not have to*

(3) is described as personal information such as bank account information, credit limit, medical records, etc. The other (visible) information on the card is described in the '461 patent as being embossed information such as the holder's serial number, name, validity dates, and/or holography. The '461 patent does not teach or suggest that this other information (which the Examiner contends corresponds to the "first printed matter" of claim 1) is ever "hidden" anywhere else on the card. The '461 patent is entirely silent about whether any of the microprint information (3) communicates the same information as information visible to the naked eye that is also printed elsewhere on the card. This is particularly pertinent, because providing information that is printed on the face of the card in "hidden" or "camouflaged" form elsewhere on the card serves as a security feature in claim 1 as amended.

The Dow patent does not remedy the deficiencies of the '461 patent. Nowhere does the Dow patent teach or suggest that it is advantageous or desirable to use a combination of printing information at a second scale and using minimal contrast, as recited in claim 1 as amended, as a way to further conceal its specifically colored security information. Applicants further note that Dow teaches the use of inks that look the same to the naked eye but look completely different when viewed using specific equipment used to bring out specific optical properties of the ink (see Col. 1, line 44 through col. 2, line 76). The specific equipment mentioned--spectroscopes or equivalent equipment that is sensitive to true or fundamental colors—is not the same thing as a magnification lens and is completely different than what is described in the pending claims as amended. Dow, whether taken alone or in combination with the '461 patent, fails to teach or suggest the claimed feature of "the combination of said minimal contrast and said second microscale substantially hiding said second printed matter from the naked eye and preventing said second printed matter from being resolved unless said second printed matter is viewed using a magnification lens."

Claims 11 and 21 have been amended similarly to the above-described amendments for claim 1 and the above arguments over the '461 patent and the Dow patent are equally applicable to the amendments to claims 11 and 21.

The Examiner has contended that Claim 11 recites "mere duplication of working features" and that it would be obvious to "construct any desirable amount of identification documents.". Applicants respectfully contend, however, that claim 11 as amended recites a

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system of tamper resistant identification documents that provides features and advantages that go beyond mere duplication. Specifically, claim 11 as amended states that the first printed matter of each card comprises first information specific to at least one of the plurality of identification documents, the identification document itself, and the particular person identified in each. The possibility of using any combination of information specific to the plurality of identifying documents, the identifying document itself, and/or information specific to the cardholder, as recited in amended claim 11, enables the card to become part of an overall system of identifying cards and provides further counterfeit deterrence features. As described in the Specification as filed at page 6, lines 3-8, the first printed matter (which will be conveyed by the smaller scale second printed matter) can comprise a combination of information common to all the cards in the system (e.g., state of issuance) and the birthdate of an applicant (information specific to the particular person identified in the card). Additional examples and advantages of such systems are explained in the specification more fully at page 4, line 16 through page 5, line 2, page 6, lines 3-19, and page 7, line 29 through page 8, line 6.

The Examiner also has stated that dependent claims 18-20 are obvious because "any desired indicia" can be displayed on the card and the printed matter is not "functionally related" to the substrate. Applicants appreciate Examiner's statements and have amended these claims to claim indicia having functional advantages for the substrate. Applicants also note that these claims depend from claim 11, which Applicants believe is now allowable for at least the reasons identified above.

Applicants have amended claim 18 to claim that the first printed matter communicates said second printed matter in an encrypted form. This functions and advantages of this feature are explained more fully in the Specification as filed at page 7, lines 10-20.

Applicants have amended claim 19 to recite that first and second printed matter comprises identifying information that is determined most likely to be altered. The functions and advantages of this feature are explained more fully in the Specification as filed at page 6, lines 9-19.

Applicants respectfully contend that claim 20 already claims printed matter that is functionally related to the substrate. By providing that the second printed matter be a graphical reproduction of the first printed matter, more complex identifying information printed on the

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card as first printed matter can be used as second printed matter. This is explained further in the Specification as filed at page 10, line 28 through page 11, line 3.

For at least the above reasons, Applicants believe that Claims 1, 11, and 21, and all claims dependent therefrom, are patentably distinguishable over the cited references and in a condition for allowance.

Favorable consideration and an early notice of allowance are hereby respectfully requested. Should the Examiner have any questions, he is invited to contact the undersigned at 781-744-6404.


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